

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

September 13, 2011

**National League of Postmasters
Motion Requesting United States Postal Service to
Provide Responses Outstanding Discovery**

Pursuant to Rule 21 of the Rules of Practice and Procedure, the National League of Postmasters of the United States (LEAGUE) hereby respectfully requests that the Presiding Officer issue an Order directing the Postal Service to provide a detailed statement addressing the status of all outstanding discovery pending, and a definite schedule for production under the expedited schedule for the proceedings in this case. The Postal Service provided Revised Responses to the LEAGUE's interrogatories on September 7, 2011, and included the information that "Responses to NLP/USPS-1(e), 15, 16 and 27 are forthcoming." The LEAGUE has not yet received said responses, which are relevant to the RAO Initiative process, and the Postal Service has not provided any additional information indicating when this information will be provided.

Discovery presently outstanding includes, but is not limited to, the following:

LEAGUE/USPS-15: Please identify in full, or provide all correspondence this year from Postal Service officials on Postal Service letterhead to any Member of Congress which concern or relate to Post Office closings or consolidations.

LEAGUE/USPS-16: Please identify in full, or provide, all emails sent from postal computers (excluding incidental personal use) this year from Postal Service officials to Members of Congress which concern or relate to Post Office closings or consolidations.

LEAGUE/USPS-27: Please provide the earned hour report for each level E and under Post Office in Delaware.

The LEAGUE is preparing rebuttal testimony in this case, which is due on September 16, 2011, only three days away, and without the responses from the United States Postal Service in advance, the LEAGUE's testimony, and the record in this proceeding, will be greatly prejudiced.

Respectfully submitted this 13th day of September, 2011.

/s/ Robert J. Brinkman

Robert J. Brinkmann
Law Offices of Robert J. Brinkmann LLC
1730 M St. N.W. Suite 200
Washington, D.C. 20036
202-331-3037; 202.331-3029 (f)
robert.brinkmann@rjbrinkmann.com

/s/ Harold Hughes

Harold Hughes
Michelle Bushman
Ford & Huff LC
10542 South Jordan Gateway, Suite 300
South Jordan, Utah 84095
801-407-8555
hal.hughes@fordhuff.com

*Counsel for the National League of
Postmasters of the United States*